REMARKS/ARGUMENTS

By this amendment, Claims 1, 13, 18 and 23 have been amended. Claims 2, 19 and 24 have been cancelled. Claims 40, 41 and 42 have been added. Hence, Claims 1, 3-18, 20-23 and 25-42 are pending in the application.

SUMMARY OF THE REJECTIONS/OBJECTIONS

Claims 1-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0037038 to Block et al. ("Block") in view of U.S. Patent Publication No. 2004/0122844 issued to Malloy et al. ("Malloy"). These rejections are respectfully traversed.

As a preliminary matter, it should be noted that Claim 1 does **not** attempt to claim the general idea of mapping metadata from a source to metadata at a target (nor of changing the metadata associated with data as the data is transferred from a source to a target). Rather, Claim 1 is directed to a **specific technique** for mapping internal metadata to external metadata. Claim 1 has been amended to emphasize the significant and fundamental differences between the invention recited in Claim 1 and the art of record.

Specifically, Block describes a system in which metadata is transformed by one or two "transformation programs" as data is streamed from one location to another. Block's process is described in the following excerpts from Block. Specifically, paragraphs 0036 and 0037 explain the context of Block's process, while paragraph 0038 mentions adding or changing labels during a data transformation operation:

> [0036] For example, the data stream can be captured at an information provider's site, transferred (as a real-time stream of data or as a data file containing contents of the captured data stream) to another location such as an

intermediate location or the information receiver's site, and then provided to the information receiver's site. The information provider computer could have, for example, a transformation program emulating a print driver, that is selected when information is to be output for mapping. The output would be provided to the transformation program, and then conveyed to the information receiver machine (by email, modem, file on floppy disk, etc.). A transformation program on the information receiver machine would then open or receive the data, and map it to a batch file format useable by a target import program or to a file format useable by a program written to update a database.

[0037] The transformation programs on the provider and receiver machines can be identical and both capable of receiving, transferring and mapping data, or can have different capabilities. For example, the transformation programs can be configured to handle an intermediate format so that the transformation program at the information provider would map the data to an intermediate format, and transfer the data in the intermediate format to the transformation program on the receiver machine. The receiver machine would map the data from the intermediate format to another format useful on the receiver machine (or as desired by a user). The programs could be different versions, so that the transformation program recognizes more formats than the transformation program at the receiver machine and thus can map more formats to or from the intermediate format. In addition or as an alternative, the transformation program on the receiver machine can be configured or featured to only map the data out of the intermediate format to another format, without being able to map data into the intermediate format in much the same way that Adobe Acrobat.TM. Readers can open and view, but not create, .pdf files. The transformation programs can also be configured to operate automatically without user intervention. For example, the transformation program on the provider machine can automatically transfer data in response to a request from the transformation program on the receiver machine, subject for example to rules or requirements (e.g., a user's prior approval to allow public access to information on the provider machine) in place on the provider machine. The provider and receiver machines can communicate via the Internet. For example, the provider machine can interface the Internet or function as a web server, and the receiver machine can interface the Internet or function as a web browser. Also, the intermediate format can be encrypted, and can be decrypted at the receiver machine in a fashion transparent to a user of the receiver machine. For example, the encryption/decryption mechanism can be a proprietary function of the transformation programs.

[0038] The transformation program can alter or transform the file it receives from the target program, for example by adding appropriate XBRL labels to the file. Alternatively, the transformation program can combine data from the file received from the target program, with the selected labels to generate and output a new, transformed file. As a further alternative, the transformation program can replace labels in the file with the newly added labels, for example when converting from one standard or language to another. This is advantageous

when it is desirable to minimize the size and complexity of the transformed file or transformed data stream.

Block makes it clear that all of Block's label adding/changing operation are performed by a transformation program in the process of transferring a stream and/or file from one point to another.

In contrast, Claim 1, as amended, requires:

1. (currently amended) A method for establishing a mapping between internal metadata and external metadata, the method comprising:
reading, from a database, said internal metadata;
wherein said internal metadata is metadata that describes data, contained in the database;
generating and displaying a screen;
wherein displaying the screen includes displaying the internal metadata, which was
read from the database, in a grid having rows and columns, wherein
dimensional metadata from said internal metadata is placed in the grid as row
headings and/or column headings;
receiving from a user a selection of a portion of said grid, said selection indicating one
or more cells of the grid;
in response to said selection, determining which internal metadata, displayed on said
grid, corresponds to said one or more cells;
wherein the internal metadata that corresponds to the one or more cells is a subset of
all internal metadata displayed in said grid;
presenting to the user one or more user interface controls for receiving, from said
user, a definition of external metadata for only said subset of internal
metadata that corresponds to cells that were selected by said selection;
receiving from said user said definition of external metadata, wherein said definition
of external metadata describes all data points within said selection; and
creating a mapping between said selected internal metadata and said defined external
metadata.

It is respectfully submitted that Block does not disclose or in any way suggest at least the limitations that are bolded above. Specifically, Block does not disclose any of the following limitations about the specific mechanism by which a user specifies a mapping between (a) internal metadata associated with user-selected data points, and (b) external metadata:

wherein displaying the screen includes displaying the internal metadata, which was
read from the database, in a grid having rows and columns, wherein

dimensional metadata from said internal metadata is placed in the grid as row headings and/or column headings;

receiving from a user a selection of a portion of said grid, said selection indicating one or more cells of the grid;

in response to said selection, determining which internal metadata, displayed on said grid, corresponds to said one or more cells;

wherein the internal metadata that corresponds to the one or more cells is a subset of all internal metadata displayed in said grid;

presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata for only said subset of internal metadata that corresponds to cells that were selected by said selection;

receiving from said user said definition of external metadata, wherein said definition of external metadata describes all data points within said selection; and

Thus, to the extent that Block is relevant at all, it is merely shows that one set of metadata can be mapped to another set of metadata. However, as explained above, that general notion is not what Claim 1 claims.

The Office Action cites Malloy in an attempt to fill the deficiencies of Block. Specifically, the Office Action cites Malloy for its disclosure of multidimensional metadata objects 130 (Malloy, FIG. 1), and its interface 150 (Malloy, FIG. 1), through which users may access, modify, or delete multidimensional metadata objects 130. Similar to Block, Malloy does show that metadata may be modified. However, also similar to Block, the context and mechanism for modifying metadata has very little to do with what is recited in Claim 1. Specifically, Malloy explains:

> A user may create, access, modify, or delete multidimensional metadata objects 130 **by submitting commands via the user interface 150**. The commands are received and processed by the multidimensional metadata software 120.

Clearly, submitting a command (whether an OLAP query or a SQL query) to modify metadata stored in a multidimensional object is completely different from the specific steps recited in Claim 1. Thus, Malloy does not disclose or in any way suggest:

wherein displaying the screen includes displaying the internal metadata, which was read from the database, in a grid having rows and columns, wherein dimensional metadata from said internal metadata is placed in the grid as row headings and/or column headings;

receiving from a user a selection of a portion of said grid, said selection indicating one or more cells of the grid;

in response to said selection, determining which internal metadata, displayed on said grid, corresponds to said one or more cells;

wherein the internal metadata that corresponds to the one or more cells is a subset of all internal metadata displayed in said grid;

presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata for only said subset of internal metadata that corresponds to cells that were selected by said selection;

receiving from said user said definition of external metadata, wherein said definition of external metadata describes all data points within said selection; and

Because these same limitations are completely missing in both Malloy and Block, the combination of Malloy and Block (even if proper) would still fail to satisfy these limitations. For these reasons, it is respectfully submitted that the Claim 1, as amended, is allowable over the Block and Malloy.

The remaining independent claims have been amended to include limitations similar to those contained in Claim 1, and are therefore allowable for the same reasons. All dependent claims inherit these same limitations, and are therefore allowable for the same reasons. In addition, each of the dependent claims introduces a separate feature that independently renders the claim patentable over the prior art. However, due to the fundamental differences already identified, and to expedite favorable resolution of this application, separate arguments are not given for those claims at this time.

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

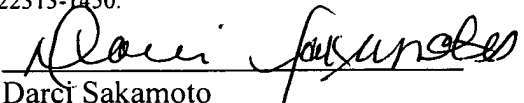Brian D. Hickman
Reg. No. 35,894

2055 Gateway Place, Suite 550
San Jose, CA 95110
(408) 414-1080
Date: December 11, 2007
Facsimile: (408) 414-1076

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Darci Sakamoto